IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

KEITH SAYLOR,)	
Plaintiff)	
v.)	Civil Action No. 1:14-cv-1709-AJT-TCB
PINNACLE CREDIT SERVICES, LLC)	
Defendant.)	

PLAINTIFF'S MOTION FOR DISMISSAL OF COUNT IV OF COMPLAINT

Pursuant to Fed. R. Civ. P. 41(a)(2) Plaintiff moves to dismiss Count IV of his complaint in this action without prejudice. Defendant, through its counsel, refuses to consent to the relief sought herein. A brief in support of this motion is submitted herewith pursuant to Local Rule 7(F).

Respectfully submitted

/s/Ernest P. Francis

Ernest P. Francis, VSB#27276 ERNEST P. FRANCIS, LTD. 505 Wythe Street Alexandria, VA 22314 (703) 683-5696 Fax (703) 683-2785

E-mail: epfrancis@tristateconsumerlawyer.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I will this 25th day of June, 2015, electronically file the foregoing Plaintiff's Motion for Dismissal of Count IV of Complaint with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to Ronald S. Canter, Esq., and Bradley T. Canter, Esq., at their office at The Law Offices of Ronald S. Canter, LLC, 200-A Monroe Street, No. 104, Rockville, MD 20850, through their e-mail addresses at reanter@roncanterllc.com and bcanter@roncanterllc.com.

/s/Ernest P. Francis

Ernest P. Francis, VSB#27276 ERNEST P. FRANCIS, LTD. 505 Wythe Street Alexandria, VA 22314 (703) 683-5696 Fax (703) 683-2785

E-mail: epfrancis@tristateconsumerlawyer.com

Attorney for Plaintiff